

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 4:12CR252
	§	Judge Crone
ARMANDO IBARRA (5)	§	
a/k/a Fat Boy	§	
JULIO CESAR MALDONADO-GONZALEZ (6)	§	
a/k/a Burqueti	§	
ANTONIO NAVAREZ REYES (7)	§	
a/k/a Tonio	§	
JORGE LUIS RAMIREZ (8)	§	

NOTICE OF EXPERT WITNESS TESTIMONY

The United States of America, by and through the undersigned Assistant United States Attorney, files this Notice.

Pursuant to Federal Rules of Evidence 702 and 703, Federal Bureau of Investigation Special Agent Heriberto Quiroga, Denton Police Department Investigator Tony Salas, and Denton County Sherriff's Office Lieutenant Jeff Davis, law enforcement officials with training and experience in drug investigations, will testify about the methods employed by drug dealers to manufacture, possess, transport, distribute, and facilitate the illegal trafficking of controlled substances; the monetary value of controlled substances; drug trafficking "tools of the trade;" quantities of controlled substances that are consistent with distribution as opposed to personal use; and related matters. Courts have consistently held that such testimony is permissible when based on the experience and qualifications of the testifying law enforcement official. *See e.g., U.S. v. Buchanan*, 70 F.3d 818, 832 - 833 (5th

Cir. 1995). Ashleigh Portales of the Denton County Sherriff's Office will testify about fingerprint comparison and related matters. Paul Steven Kusco of the Drug Enforcement Administration will testify about analysis of suspected controlled substances and related matters.

Respectfully submitted,

JOHN M. BALES
UNITED STATES ATTORNEY

/s/
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CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing notice was served by electronic filing by CM/ECF to defense counsel on this 31st day of July, 2014.

/s/
G. R. JACKSON